

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ROGER KNOX,

Defendant

Criminal Action No. 18-cr-10385-NMG

**ASSENTED TO MOTION OF DEFENDANT  
ROGER KNOX TO FURTHER MODIFY APPEARANCE BOND**

Defendant Roger Knox (“Knox”), with the assent of the United States of America, respectfully moves to further modify the Appearance Bond entered into pursuant to the Order Setting Conditions of Release in this matter dated April 2, 2020 (the “Order”), as recently modified by order dated September 15, 2021, to allow Knox to travel outside Massachusetts for the purpose of attending a career development course in eastern New York on 13 separate days between September 26 and December 4, 2021. As grounds for this motion, Knox states as follows:

1. The Order prohibits Knox from traveling outside Massachusetts without court order.
2. Over the last month, Knox has been actively seeking employment opportunities as a ski patrol for the upcoming winter season. Knox has been offered a conditional position as a ski patrol on the condition that he complete a National Ski Patrol sponsored Outdoor Emergency Care (OEC) class and an Outdoor Emergency Transportation (OET) (*sled training*) class. The OEC class is a prerequisite for the OET class.
3. The only appropriate OEC class that Knox has been able to identify is a class offered by West Mountain (NY) Ski Patrol in Queensbury, NY. He has registered for, and been accepted into, that OEC class which begins on September 26, 2021 and extends through examinations on December 2 and 4, 2021. The current schedule requires Knox to attend sessions in Queensbury, NY from 8:00 am to 4:00 pm on September 26; October 9, 10, 17, 23, and 24; November 7, 13, 14, 20, and 21; and December 2 and 4.
4. Knox will continue to wear an electronic monitoring device while attending these classes.
5. The United States Probation Department and Pretrial Services Office has confirmed that Knox has had no substantive issues of non-compliance while on release and has no objection to the present requested modification.

WHEREFORE, Knox respectfully requests that this Court allow the present motion and enter an order modifying the Appearance Bond entered into pursuant to the Order Setting Conditions of Release in this matter dated April 2, 2020, as modified by order dated September 15, 2021, to allow Knox to travel to Queensbury, NY to attend the Outdoor Emergency Care class offered by the West Mountain (NY) Ski Patrol on the identified dates between September 26 and December 4, 2021, or as otherwise specifically approved by Knox’s pretrial services officer.

Respectfully,

ROGER KNOX  
Defendant

By: /s/ Mark A. Berthiaume  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2021, I served a copy of the foregoing on counsel of record in this case via electronic mail.

/s/ Mark A. Berthiaume  
Mark A. Berthiaume

Date: September 20, 2021